



January 9, 2022

City of Alameda Planning Board  
2263 Santa Clara Avenue, Room 190  
Alameda, CA 94501

**Subject: Housing Element – Proposed Zoning Amendments for Shopping Center Sites (Item 7-B on 1-10-22 Planning Board agenda)**

Dear Planning Board members,

The Alameda Architectural Preservation Society (AAPS) generally supports this proposal. It is especially good that the Estuary shopping centers are being proposed for robust residential densities, which will hopefully take pressure off potential upzoning of existing residential and historic commercial areas to help meet the Regional Housing Needs Assessment (RHNA).

We have the following specific comments:

1. **The maximum density and height limits should probably not be the same for every shopping center site.** For example, perhaps the estuary sites should be at the high end and less accessible and/or constrained sites such as Neptune Plaza and Harbor Bay at the low end.
2. **Consider increasing the proposed density for the Estuary shopping centers higher than the proposed 100 units per acre to maximize development potential.** This might provide further encouragement to develop the shopping centers without using the state density bonus.
3. **Ground-floor residential uses should perhaps not be prohibited if they do not front a public right-of-way,** given the decreased viability of bricks and mortar retail. And even a prohibition on residential uses that do front certain public rights-of-way may need further thought. For example, the prohibition should perhaps not apply along certain specified minor public rights-of-way. Consider using the Planned Development process to sort out these kinds of issues.
4. **Retain the existing 40'/three story height limit for the proposed Neptune Plaza Multi-Family Residential Zone** (south side of Central Avenue on both sides of Webster Street in the Webster Street Business District). The proposed 60'/five story height limit would be out of scale with everything in close proximity, including historic buildings such as Croll's, and the height limit could be increased with a density bonus project. Addressing Neptune Plaza as part of the upcoming zoning proposal for Webster Street would make more sense.

5. **Since South Shore has already expressed interest in 800 units, assuming only 400 units for all of the remaining shopping centers seems too low.** We understand that the State Housing and Community Development Department (HCD) wants letters from property owners of developed lots stating their intent to develop a specified number of units and would like to thank staff for soliciting these letters from the shopping center owners. But we also understand that HCD may be willing to accept a percentage (albeit perhaps a low percentage) of the site development potential as part of the Housing Element's strategy for meeting the RHNA. **The development potential of each shopping center site based on the proposed zoning should therefore be provided.**

Thank you for the opportunity to comment. Please contact me at (510) 523-0411 or [cbuckleyAICP@att.net](mailto:cbuckleyAICP@att.net) if you would like to discuss these comments.

Sincerely,

Christopher Buckley, Chair  
Preservation Action Committee  
Alameda Architectural Preservation Society

cc: Mayor and City Councilmembers (by electronic transmission)  
Andrew Thomas and Allen Tai, Planning, Building, and Transportation Department (by electronic transmission)  
AAPS Board and Preservation Action Committee (by electronic transmission)